

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jaylynn Dean c. Uber Technologies, Inc., et al.*,  
3:23-cv-06708-CRB

Case No.: 3:23-MD-03084-CRB

**JOINT STATUS REPORT PURSUANT  
TO ECF 3675**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

The Parties respectfully submit this joint status report regarding Plaintiff Jaylynn Dean's production in response to the Court's Order. *See* ECF 3675. On August 13, Plaintiff and her counsel made a production of documents of 1605 pages, many of which contained redactions. Plaintiff's accompanying privilege log listed 34 separate documents that contained redactions, which Plaintiffs assert relate to plaintiffs other than Plaintiff Jaylynn Dean. Defendants have concerns that the redactions are overbroad and contain communications covered by the Court's Order. The parties have met and conferred with respect to the scope of the redactions. Plaintiff and her counsel have agreed to remove all redactions within the production except for the names of any client other than Jaylynn Dean. Plaintiff will provide the updated production to Defendants by August 22, 2025. Defendants reserve their right to submit a PTO 8 letter brief to the Court on an expedited fashion to ensure it can be fully briefed before the August 28, 2025 conference with the Court in the event any disputes remain with respect to Plaintiff's amended production.

1 .  
2  
3 DATED: August 20, 2025  
4

5 By: /s/ Rachel B. Abrams  
6 ROOPAL P. LUHANA (*Pro Hac Vice*)  
7 **CHAFFIN LUHANA LLP**  
8 600 Third Avenue, Fl. 12  
9 New York, NY 10016  
10 Telephone: (888) 480-1123  
11 Email: luhana@chaffinluhana.com  
12

13 SARAH R. LONDON (SBN 267083)  
14 **GIRARD SHARP LLP**  
15 601 California St., Suite 1400  
16 San Francisco, CA 94108  
Telephone: (415) 981-4800  
Email: slondon@girardsharp.com  
17

18 RACHEL B. ABRAMS (SBN 209316)  
19 **PEIFFER WOLF CARR KANE**  
20 **CONWAY & WISE, LLP**  
21 555 Montgomery Street, Suite 820  
22 San Francisco, CA 94111  
23 Telephone: (415) 426-5641  
24 Email: rabrams@peifferwolf.com  
25

26 *Co-Lead Counsel for Plaintiffs*  
27  
28

Respectfully submitted,

By: /s/ Laura Vartain  
LAURA VARTAIN  
**KIRKLAND & ELLIS LLP**  
LAURA VARTAIN  
Laura.vartain@kirkland.com  
ALLISON M. BROWN (*pro hac vice*)  
Alli.brown@kirkland.com  
JESSICA DAVIDSON (*pro hac vice*)  
Jessica.davidson@kirkland.com  
17

*Counsel for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC*  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **CERTIFICATE OF SERVICE**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing

/s/ Tiffany R. Ellis  
Tiffany R. Ellis